

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BRIAN JOSEPH GREF,

Plaintiff,

-against-

AMERICAN INTERNATIONAL INDUSTRIES,
*individually and as successor-in-interest for the
CLUBMAN BRAND*, and to THE NESLEMUR
COMPANY and PINAUD COMPANY, *et al.*,

Defendants.

Case No. 1:20-cv-05589-GBD-DCF

STIPULATION

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys for Plaintiff Brian Joseph Gref (“Plaintiff”), and Defendant Colgate-Palmolive Company, as a successor-in-interest to the Mennen Company (“Defendant” or “Mennen”), that, any and all relief sought by Plaintiff in its original and amended motions (ECF #346 and #348) seeking an Order sanctioning Defendant American International Industries (“A.I.I.”), including but not limited to rulings related to the “Bell issue,” is sought against Defendant A.I.I. only;

IT IS ALSO HEREBY STIPULATED AND AGREED that Plaintiff is not seeking any relief in said motions as and against Mennen and as such, Mennen need not submit any opposition to Plaintiff’s motion;

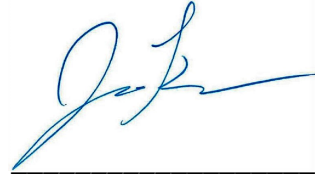
IT IS FURTHER STIPULATED AND AGREED THAT all rights, objections and/or arguments that Mennen may have, whether procedural or substantive, as to any of the issues raised in or relief sought within the aforementioned motions, including, but not limited to the “Bell issue,” are fully preserved;

IT IS FURTHER STIPULATED AND AGREED that this Stipulation may be executed in counterparts with email, PDF, or electronic signatures treated as originals.

Dated: June 14, 2023

SIMMONS HANLY CONROY

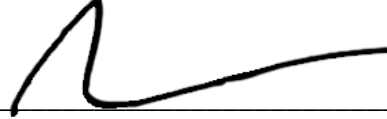
Attorneys for Plaintiff



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COMPANY, as a successor-in-interest to THE
MENNEN COMPANY*



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SO ORDERED:

HONORABLE VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE